

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Commission's Rules)	<u>CC Docket No. 96-45</u>
to provide Universal Service Lifeline)	<u>CC Docket No. 03-109</u>
support for Payphone Line Service)	
)	

COMMENTS OF ROSEBUD TELEPHONE, LLC
ON EMERGENCY PETITION FOR INTERIM RELIEF TO PREVENT
THE DISAPPEARANCE OF PAYPHONES AND PETITION FOR RULE MAKING
TO PROVIDE LIFELINE SUPPORT TO PAYPHONE
LINE SERVICE

COMES NOW Rosebud Telephone LLC, and provides the following comments *supporting* the referenced Petitions.

Rosebud is an experienced competitive local exchange company based in Texas. Rosebud began its CLEC operations in 1999 and has always focused its business on the provision of telecommunications services to pay telephone providers. Rosebud is a certificated CLEC in: Alabama, Arkansas, California, Florida, Kansas, Kentucky, Missouri, New York, Oklahoma, and Texas.

Since its inception of services in Rosebud has witnessed a dramatic decline in the number of public pay telephones. One of the key Rosebud managers, Mr. Greg Taylor, also operates a separate pay telephone company. Due to economic considerations and competition from the wireless industry, Mr. Taylor has had to remove many public pay telephones from the mostly rural communities his business serves. Typically, his payphone will be the only one available in many towns.

The extension of Lifeline benefits to pay telephone lines will enable that industry to stabilize and not see a further decline in the availability of pay telephones.

Rosebud Telephone agrees with all the comments made in the referenced rulemaking petitions. Payphones do provide critical communications services to those without a phone of their own and provide a necessary infrastructure in times of disaster or emergency. Payphones also serve as a reliable back-up for those who do have mobile telephone service but who find themselves without that service for various reasons including simply running out of battery power. There are, quite simply, real-world limitations on the ability of mobile providers to reach all Americans.

While the Commission works to expand universal service concepts to broadband access, Rosebud Telephone ask that policy makers ensure that no American is denied access to basic communications services. Expansion of Lifeline program benefits to payphones will further the core objective of universal service and prevent the further decline of payphone availability.

Respectfully submitted,

Mark Foster
Attorney at Law
707 West Tenth Street
Austin, TX 78701
(512) 708-8700
(512) 697-0058/fax

By: 
Mark Foster
Texas Bar No. 07293850
mark@mfoosterlaw.com
Attorney for Rosebud Telephone, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the above and foregoing document was served on the following individual on this the 18th day of January, 2011.

Best Copy and Printing, Inc.
445 12th Street, S.W.
Room CY-B402
Washington, D.C. 20554

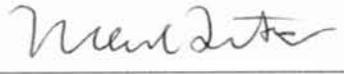
VIA FIRST CLASS MAIL

Rebekah Bina
Telecommunications Access Division
Wireline Competition Bureau
445 12th Street, S.W.
Room 5-A521
Washington, D.C. 20554

VIA FIRST CLASS MAIL

Charles Tyler
Telecommunications Access Division
Wireline Competition Bureau
445 12th Street, S.W.
Room 5-A452
Washington, D.C. 20554

VIA FIRST CLASS MAIL



Mark Foster